

Exhibit 1

In The Matter Of:

In re PARMALAT SECURITIES LITIGATION v.

STEFANIA CHIARUTTINI

October 12, 2006

CONFIDENTIAL

LEGALINK MANHATTAN

420 Lexington Avenue - Suite 2108

New York, NY 10170

PH: 212-557-7400 / FAX: 212-692-9171

CHIARUTTINI, STEFANIA - Vol. 2



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1 STEFANIA CHIARUTTINI - CONFIDENTIAL

18:09:06 2 Okay.

18:09:12 3 Q. Are you doing work for
18:09:13 4 anyone other than Drs. Greco and Bondi
18:09:17 5 in connection with Parmalat?

18:09:27 6 A. No, absolutely not.

18:09:59 7 MR. CALAMARI: Do you need a
18:10:00 8 break to get your questions ready?18:10:03 9 MR. HOROWITZ: Actually when
18:10:04 10 I break I'm going to want to break for
18:10:06 11 the evening. I just want to see if
18:10:07 12 there are any other areas I want to go
18:10:09 13 into before I break for the evening.
18:10:11 14 And I had a question and I lost it,
18:10:13 15 which suggests it's getting too late in
18:10:15 16 the day. I lost it in my head.18:10:19 17 Q. Have you seen the protective
18:10:27 18 order governing confidentiality of
18:10:29 19 documents produced in the United States
18:10:33 20 cases?

18:10:48 21 A. Yes, I saw a copy of it.

18:10:51 22 Q. And did you sign a copy of
18:10:52 23 it?

18:10:55 24 A. No.

18:10:58 25 Q. Did you agree to abide by

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1 STEFANIA CHIARUTTINI - CONFIDENTIAL

18:11:00 2 its terms?

18:11:16 3 A. I -- what do you mean by
18:11:19 4 abide? I don't understand the
18:11:21 5 question.

18:11:21 6 Q. Have you agreed to be bound
18:11:24 7 by the protective order?

18:11:35 8 A. I did not sign it,
18:11:37 9 therefore, I don't think so.

18:11:51 10 Q. You have a firm, correct, a
18:11:56 11 company?

18:12:02 12 A. It's a professional office.
18:12:06 13 In Italy it's different.

18:12:09 14 Q. How many people work for
18:12:10 15 you?

18:12:21 16 A. Do you mean employees or do
18:12:23 17 you mean the total number of associates
18:12:26 18 of partners and employees?

18:12:30 19 Q. That helps. How many people
18:12:33 20 work in the office in any capacity,
18:12:35 21 first of all?

18:12:47 22 A. To tell you the truth I
18:12:48 23 never counted it. I think we are about
18:12:51 24 15, more or less. Between those who
18:12:56 25 come and who go, those who are on

Exhibit 2

In The Matter Of:

In re PARMALAT SECURITIES LITIGATION v.

OLIVER GALEA

March 3, 2007

CONFIDENTIAL
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GALEA, OLIVER - Vol. 2

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1 CONFIDENTIAL - OLIVER GALEA - VOLUME II

2 M O R N I N G S E S S I O N

09:01:33 3 9:11 a.m.

09:01:33 4 EXAMINATION BY MR. DELL:

09:11:16 5 Q. Good morning, Mr. Galea.

09:11:17 6 My name is Michael Dell, I represent

09:11:21 7 Deloitte Touche Tohmatsu, and I have

09:11:23 8 some questions for you.

09:11:29 9 A. Good morning.

09:11:30 10 Q. Sir, have you been retained
09:11:31 11 as a consultant or an expert witness by
09:11:34 12 any parties to the multi district
09:11:36 13 litigation in the United States?

09:11:37 14 A. No.

09:11:59 15 Q. And, sir, have you seen the
09:12:01 16 protective order governing
09:12:03 17 confidentiality of documents that has
09:12:05 18 been entered in the multi district
09:12:07 19 litigations in the United States?

09:12:08 20 A. No.

09:12:20 21 Q. I'm going to hand you
09:12:21 22 what's been marked as Exhibit 13,037
09:12:26 23 and ask you whether you will agree to
09:12:28 24 be bound by that protective order, sir.

09:12:31 25 MR. GRANT: Objection to

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1 CONFIDENTIAL - OLIVER GALEA - VOLUME II
09:12:32 2 that as completely inappropriate.
09:12:34 3 You've pulled this stunt
09:12:35 4 twice. Can we at least just do the
09:12:38 5 short version of it?
09:12:50 6 MR. DELL: Just so the
09:12:51 7 record is clear, I am going to say this
09:12:52 8 once at the beginning.
09:12:53 9 We are going to keep track
09:12:54 10 of improper objections, such as the one
09:12:56 11 that has just been made, when someone
09:12:58 12 is supposed to be limited to objection
09:12:59 13 to form.
09:13:00 14 We are not -- we are not
09:13:02 15 going to charge that against our time.
09:13:05 16 We are also going to argue when we make
09:13:08 17 our motion to preclude in the District
09:13:11 18 Court in the United States that this
09:13:12 19 kind of tactic, which has been tried in
09:13:15 20 the prior depositions, is preventing us
09:13:17 21 from being able to cross-examine this
09:13:19 22 witness.
09:13:21 23 MR. GRANT: Michael, we're
09:13:22 24 all aware that this is all a stunt to
09:13:24 25 see if you can bait the witness to walk

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1 CONFIDENTIAL - OLIVER GALEA - VOLUME II
09:13:26 2 out, to do whatever else you can to be
09:13:28 3 able to claim that you didn't have a
09:13:30 4 fair chance to cross-examine, and I
09:13:33 5 understand that that's part of your
09:13:34 6 game, but it's offensive to the
09:13:36 7 witness; it's offensive to the rest of
09:13:39 8 us here to waste our time to ask him to
09:13:41 9 be bound to a legal document when he
09:13:43 10 hasn't had time to read it, when he
09:13:45 11 hasn't had time to consult with
09:13:45 12 counsel, when it is not a proper use
09:13:47 13 under the Hague Convention, and it's
09:13:48 14 just plain garbage.
09:13:51 15 If you really felt that this
09:13:52 16 was that important, you knew when this
09:13:53 17 deposition was. You could have sent
09:13:54 18 this stuff a month ago to counsel for
09:13:57 19 PricewaterhouseCoopers and said, Would
09:13:59 20 you please agree to this because I want
09:14:01 21 to do something with this.
09:14:03 22 And this pure garbage; it's
09:14:04 23 pure wasting our time; and it's pure
09:14:05 24 trying to bait the witness in order to
09:14:08 25 try to get some kind of advantage for

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1 CONFIDENTIAL - OLIVER GALEA - VOLUME II
09:14:09 2 your motion, which you have started to
09:14:10 3 at least hint at what that is.
09:14:12 4 MR. KIEVE: And I would just
09:14:13 5 respond that I concur with the spirit,
09:14:17 6 if not the language, of Class counsel's
09:14:19 7 statement.
09:14:21 8 I believe this is entirely
09:14:23 9 improper. And the record speaks for
09:14:28 10 itself.
09:14:29 11 Second of all, I take
09:14:30 12 exception to the notion that somehow
09:14:32 13 you are the timekeeper in this
09:14:34 14 proceeding.
09:14:34 15 We are all commissioners --
09:14:36 16 at least some of us are commissioners.
09:14:38 17 And I don't think you have a fiat over
09:14:40 18 how you proceed.
09:14:41 19 We've agreed that there is a
09:14:42 20 specific amount of time, and I suggest
09:14:43 21 you use it as you see fit, wisely.
09:14:48 22 MS. CANNON: Mr. Dell, I
09:14:53 23 think, as you know from the previous
09:14:56 24 depositions, we take the view that it
09:15:00 25 is not appropriate to ask any witness

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1 CONFIDENTIAL - OLIVER GALEA - VOLUME II
 09:15:03 2 under the Hague Convention to agree to
 09:15:08 3 be bound by an order entered in the
 09:15:11 4 U.S. proceedings.
 09:15:12 5 The comments that we made in
 09:15:14 6 the past two depositions are the same
 09:15:17 7 comments we'd like to make now. Rather
 09:15:21 8 than repeat them, I will object to this
 09:15:24 9 and also instruct the witness not to
 09:15:26 10 answer the question.
 09:15:28 11 MR. GRANT: I need to --
 09:15:29 12 MR. DELL: Thank you.
 09:15:30 13 MR. GRANT: I need to add
 09:15:31 14 one more thing, here.
 09:15:31 15 Because you've already said
 09:15:33 16 that the reason you're doing this is to
 09:15:34 17 use this as an argument to the court to
 09:15:36 18 preclude this witness's testimony, I
 09:15:38 19 would like you to make a proffer on the
 09:15:41 20 record now what documents you would
 09:15:43 21 show this witness that you are now
 09:15:44 22 precluded by the protective order from
 09:15:46 23 showing him because he will not agree
 09:15:48 24 to it?
 09:15:48 25 Because the way I read the

Exhibit 3

In The Matter Of:

In Re: PARMALAT SECURITIES LITIGATION,

ROBERTO MEGNA

February 28, 2007

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MEGNA, ROBERTO - Vol. I

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1 CONFIDENTIAL - ROBERTO MEGNA - VOLUME I

16:08:11 2 Dr. Megna, have you been

16:08:14 3 retained as a consultant or an expert

16:08:17 4 witness by any party to the multi

16:08:21 5 district litigations relating to

16:08:22 6 Parmalat in the United States?

16:08:45 7 A. No.

16:08:46 8 Q. Is there anyone who you

16:08:51 9 have done work for in connection with

16:08:52 10 Parmalat other than the Parma public

16:08:57 11 prosecutor?

16:09:00 12 A. No.

16:09:11 13 Q. Sir, have you seen the

16:09:18 14 protective order governing the

16:09:20 15 confidentiality of documents and

16:09:22 16 information produced in the multi

16:09:24 17 district litigations relating to

16:09:26 18 Parmalat in the United States?

16:09:27 19 A. No.

16:09:48 20 Q. Dr. Megna, I'm going to

16:10:53 21 hand you what was marked in a

16:10:55 22 deposition yesterday as Deposition

16:10:57 23 13,037 and ask you whether you've seen

16:11:01 24 that before.

16:11:39 25 A. No, I can't remember.

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1 CONFIDENTIAL - ROBERTO MEGNA - VOLUME I

16:11:42 2 Q. And, sir, you're

16:11:43 3 represented by counsel here today?

16:11:51 4 A. Yes.

16:11:52 5 Q. Yes. And who is your

16:11:53 6 counsel, sir?

16:11:54 7 A. Mr. Marco Golda Perini

16:12:10 8 and -- sorry.

16:12:12 9 MS. CANNON: Lista.

16:12:13 10 A. Lista.

16:12:14 11 Q. Mr. Dell, would you be

16:12:16 12 agree to be bound by the protective

16:12:19 13 order which was marked as

16:12:21 14 Exhibit 13,037?

16:12:22 15 MS. CANNON: Mr. Dell, out

16:12:25 16 of courtesy to you, we proceeded with

16:12:26 17 having this marked. The witness has

16:12:27 18 said he's never seen it.

16:12:28 19 But as you know very well,

16:12:31 20 Mr. Megna is not a party to this

16:12:35 21 action. He is here because the Italian

16:12:37 22 court has requested him as an Italian

16:12:41 23 citizen to come and assist U.S. court

16:12:44 24 in obtaining evidence for use at trial.

16:12:46 25 This stipulated protective

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1 CONFIDENTIAL - ROBERTO MEGNA - VOLUME I
 16:12:50 2 order is not a document to which
 16:12:53 3 Mr. Megna will agree to become a party,
 16:12:58 4 if that's your request.
 16:13:01 5 MR. DELL: All right.
 16:13:02 6 Actually, his testimony was he couldn't
 16:13:04 7 remember whether he had seen it before.
 16:13:05 8 But if you're directing him
 16:13:07 9 not to answer, then you can give your
 16:13:08 10 direction. I would like the witness,
 16:13:09 11 though, to tell me whether he will
 16:13:10 12 agree to be bound by this stipulated
 16:13:12 13 protective order, which his counsel has
 16:13:15 14 seen, certainly, and has had a chance
 16:13:16 15 to review.
 16:13:23 16 Q. Let me pose a question and
 16:13:24 17 then your lawyer will have an
 16:13:25 18 opportunity, if she wants, to give you
 16:13:27 19 a direction or you can answer. Sir,
 16:13:28 20 will you agreed to be bound by this
 16:13:30 21 stipulated protective order?
 16:13:32 22 MS. CANNON: I'm going to
 16:13:33 23 object to the question on the grounds
 16:13:36 24 that it is oppressive and an abuse of
 16:13:40 25 the position you're in here today as a

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1 CONFIDENTIAL - ROBERTO MEGNA - VOLUME I
16:13:43 2 guest of the Italian court.
16:13:46 3 It is not proper for
16:13:48 4 Mr. Megna to be asked to be bound to
16:13:50 5 any document relating to the
16:13:51 6 jurisdiction of the courts in the
16:13:53 7 United States.
16:13:53 8 If you insist on a direction
16:13:55 9 that he not respond to your question, I
16:13:57 10 will so direct.
16:13:58 11 But I want to make it
16:13:59 12 absolutely clear that we do so not in
16:14:01 13 any way being uncooperative with the
16:14:04 14 requests made by the Italian court for
16:14:07 15 Mr. Megna to come here today and give
16:14:07 16 his testimony but we do so because we
16:14:10 17 view this as an oppressive attempt to
16:14:12 18 enforce some form of jurisdiction in
16:14:14 19 the U.S. courts which does not exist on
16:14:16 20 Mr. Megna.
16:14:17 21 MR. DELL: I think the
16:14:18 22 question was very simple. In any
16:14:20 23 event, the record will speak for
16:14:21 24 itself.
16:14:23 25 MR. GRANT: I would like

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16:14:23 1 CONFIDENTIAL - ROBERTO MEGNA - VOLUME I
16:14:23 2 that translated for the witness,
16:14:25 3 please.

16:14:28 4 THE INTERPRETER: His
16:14:29 5 question or everything?

16:14:30 6 MR. GRANT: No. What was
16:14:31 7 said by the witness's counsel.

16:15:24 8 (Translation.)

16:16:08 9 MS. CANNON: Just before we
16:16:09 10 leave this topic, I think you made a
16:16:11 11 reference -- a slight reference to
16:16:14 12 counsel had an opportunity to review
16:16:15 13 this document.

16:16:17 14 Again, I am going to make it
16:16:18 15 absolutely clear for the record that
16:16:19 16 with respect to Mr. Megna's position
16:16:20 17 today, Italian counsel has not seen
16:16:24 18 this document. It's an English
16:16:25 19 document in any event, not a
16:16:27 20 translation. And his counsel has not
16:16:30 21 had an opportunity to review it.

16:16:31 22 I'm only responding to the
16:16:32 23 point you made on the record to seem to
16:16:34 24 indicate that there had been some
16:16:35 25 review of the document. That has not

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1 CONFIDENTIAL - ROBERTO MEGNA - VOLUME I
 16:16:37 2 occurred.

16:16:37 3 It does not change the
 16:16:39 4 answer that we've given with respect to
 16:16:41 5 Mr. Megna's undertaking not to answer
 16:16:45 6 the question.

16:16:45 7 MR. DELL: Ms. Cannon, first
 16:16:47 8 of all, I think it would be better not
 16:16:48 9 to have these lengthy colloquies.

16:16:49 10 And, secondly, as you know,
 16:16:50 11 I handed you a copy of that document
 16:16:52 12 yesterday when I had another copy
 16:16:55 13 marked.

16:16:57 14 MS. CANNON: Mr. Dell, as I
 16:16:58 15 answered yesterday -- and we shouldn't
 16:16:59 16 be talking about yesterday's testimony,
 16:17:01 17 but for this purpose, since you invite
 16:17:02 18 me to, I will.

16:17:03 19 Yesterday, you handed me an
 16:17:05 20 English copy of that document. I did
 16:17:07 21 not study it, but in any event, did not
 16:17:10 22 hand Italian counsel an Italian version
 16:17:12 23 of that document.

16:17:14 24 MR. DELL: Can we proceed
 16:17:14 25 now with questioning? Thank you, sir.

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Exhibit 4

In The Matter Of:

In re PARMALAT SECURITIES LITIGATION

FRANCO LAGRO

February 27, 2007

CONFIDENTIAL
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LAGRO, FRANCO - Vol. 2

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1 CONFIDENTIAL - FRANCO LAGRO - VOLUME II
15:08:09 2 MR. DeVOOGHT: I have
15:08:18 3 nothing further, Dr. Lagro. Thank you
15:08:19 4 for your time.
15:08:21 5 THE DEPONENT: Thank you.
15:08:21 6 EXAMINATION BY MR. DELL:
15:08:24 7 Q. Good afternoon, Mr. Lagro.
15:08:36 8 My name is Michael Dell. I represent
15:08:40 9 Deloitte Touche Tohmatsu.
15:08:46 10 A. Good afternoon.
15:08:46 11 Q. Sir, have you been retained
15:08:48 12 as a consultant or testifying witness
15:08:53 13 by Dr. Bondi in any of the U.S.
15:08:55 14 litigations?
15:09:11 15 A. No.
15:09:12 16 Q. Sir, have you ever seen the
15:09:14 17 stipulated protective order in the
15:09:16 18 multi-district litigations in the
15:09:18 19 United States?
15:09:18 20 A. Well, actually, I don't know
15:09:48 21 what document you're talking about. I
15:09:52 22 don't think so. I've never heard of
15:09:53 23 it, so I presume that I have never seen
15:09:57 24 it.
15:09:59 25 Q. Okay. Well, I'm going to

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1 CONFIDENTIAL - FRANCO LAGRO - VOLUME II
 15:10:01 2 mark as the next exhibit, which is
 15:10:03 3 13,037, the stipulated protective order
 15:10:09 4 and hand it to the witness.
 15:10:11 5 (Deposition Exhibit
 15:10:18 6 13,037 for identification.)
 15:10:18 7 Q. Could you tell us whether
 15:10:18 8 you have ever seen this document
 15:10:20 9 before.
 15:10:45 10 A. Not to my recollection.
 15:10:50 11 Q. Sir, do you agree to be
 15:10:51 12 bound by this stipulated protective
 15:10:54 13 order with respect to confidential
 15:10:57 14 information that's been produced in the
 15:11:00 15 multi-district litigations in the
 15:11:02 16 United States?
 15:11:03 17 MR. GRANT: Objection.
 15:11:07 18 MS. CANNON: Excuse me. I
 15:11:08 19 think we need to be clear what the
 15:11:09 20 jurisdictional basis there would be for
 15:11:11 21 any question of that nature.
 15:11:12 22 Dr. Bondi's [sic] here, as
 15:11:13 23 you know, pursuant to an order of the
 15:11:16 24 Italian court at the specific request
 15:11:18 25 of the court in the United States.

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1 CONFIDENTIAL - FRANCO LAGRO - VOLUME II
15:11:20 2 MR. DELL: I think you said
15:11:22 3 Dr. Bondi. I think you meant
15:11:22 4 Dr. Lagro.
15:11:22 5 MS. CANNON: Excuse me,
15:11:24 6 Dr. Lagro. I beg your pardon.
15:11:25 7 He has just testified that
15:11:27 8 he does not recall ever having seen
15:11:28 9 this document. Accordingly, he would
15:11:30 10 therefore not be aware of its contents.
15:11:32 11 I think if you're going to
15:11:33 12 ask that question, first, he would have
15:11:35 13 to read it very carefully. Second, I
15:11:38 14 think he would have to have legal
15:11:39 15 advice as to whether or not he
15:11:40 16 understood it, whether there was a
15:11:41 17 proper basis for him to submit to the
15:11:44 18 jurisdiction of the courts with respect
15:11:46 19 to confirming the question which you
15:11:49 20 asked.
15:11:50 21 So unless there's something
15:11:53 22 specific about understanding the
15:11:54 23 confidentiality of these proceedings
15:11:56 24 that you want to talk to him about, to
15:11:59 25 ask him to subscribe in any way to an

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1 CONFIDENTIAL - FRANCO LAGRO - VOLUME II
 15:12:01 2 undertaking which is binding the
 15:12:03 3 parties to the litigation in the United
 15:12:05 4 States is going to be a difficult
 15:12:07 5 process and certainly not a process
 15:12:09 6 which I think we will be able to
 15:12:10 7 resolve today.
 15:12:12 8 MR. DELL: Well, look.
 15:12:14 9 Thank you very much. I'm going to ask,
 15:12:16 10 though, that any objections be
 15:12:17 11 restricted to objection to form.
 15:12:19 12 I simply want to ask this
 15:12:21 13 witness whether he will be bound by the
 15:12:23 14 stipulated protective order. If he
 15:12:25 15 chooses to say no, he can say no. And
 15:12:27 16 I think it's a perfectly fair question.
 15:12:29 17 And I'd like to proceed and have my
 15:12:31 18 questions answered without lengthy
 15:12:33 19 objections.
 15:12:34 20 So he is someone who's been
 15:12:36 21 hired by Dr. Bondi who is a party to
 15:12:38 22 the litigations. He's done work for
 15:12:40 23 him. He's consulted with the lawyers.
 15:12:43 24 He's already testified in connection
 15:12:44 25 with their work on the Complaint. And

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1 CONFIDENTIAL - FRANCO LAGRO - VOLUME II

15:12:47 2 I think it's a very simple question.

15:12:49 3 Q. So I put it to you, sir,

15:12:50 4 will you agree to be bound by the

15:12:51 5 stipulated protective order?

15:12:54 6 MR. KIEVE: I am limited to

15:12:54 7 an objection to form. I object to

15:12:56 8 form.

15:12:58 9 MR. GRANT: I object to the

15:13:00 10 whole thing. And you are not asking a

15:13:02 11 question of a percipient witness here;

15:13:04 12 you're asking him to be bound to a

15:13:06 13 legal document which he has every right

15:13:08 14 to consult with counsel and review

15:13:09 15 before they take a position on whether

15:13:10 16 they're going to do it or not. That's

15:13:12 17 outrageous.

15:13:13 18 MS. CANNON: Can I also just

15:13:15 19 say that the agreements amongst counsel

15:13:18 20 with respect to objections as to form

15:13:20 21 and whatever directions the court in

15:13:22 22 the United States has given do not

15:13:24 23 affect Dr. Lagro's rights under Italian

15:13:27 24 law.

15:13:28 25 He is not party to any

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1 CONFIDENTIAL - FRANCO LAGRO - VOLUME II
15:13:30 2 agreements with respect to the U.S.
15:13:32 3 litigation.
15:13:33 4 Now, if there are issues
15:13:34 5 about Dr. Lagro, for example,
15:13:37 6 understands that he's not to take any
15:13:43 7 documents from this deposition and
15:13:46 8 refer to them or use them in any other
15:13:48 9 context, I mean, those are different
15:13:51 10 questions which go to his understanding
15:13:52 11 of the nature of this proceeding.
15:13:54 12 But I don't think that he is
15:13:55 13 limited in his ability through his
15:13:58 14 counsel to object only as to form.
15:14:00 15 And I certainly think that
15:14:01 16 his agreement -- he would be advised by
15:14:04 17 counsel, certainly United States
15:14:07 18 counsel, and I'm assuming Italian
15:14:09 19 counsel, not to consent to agreeing to
15:14:12 20 be bound by an order entered by the
15:14:14 21 court in the United States without
15:14:16 22 having taken full legal advice.
15:14:17 23 And that advice will not be
15:14:19 24 taken in the course of the time left
15:14:21 25 today for this deposition.

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1 CONFIDENTIAL - FRANCO LAGRO - VOLUME II

15:14:25 2 MR. DELL: All right. Are

15:14:25 3 you instructing him not to answer? If

15:14:27 4 not, I'd like an answer to my question.

15:14:32 5 MS. CANNON: I am going to

15:14:33 6 consult with Italian counsel.

15:14:36 7 MR. KIEVE: I would also

15:14:37 8 direct counsel's attention to paragraph

15:14:39 9 11 (D) of the protective order,

15:14:43 10 Exhibit 13,037.

15:15:21 11 (A discussion was had off

15:15:23 12 the record.)

15:15:23 13 MS. CANNON: I think in

15:15:32 14 response to your question, Italian

15:15:34 15 counsel does not feel able to advise

15:15:38 16 his client as to his rights with

15:15:41 17 respect to the question you've asked,

15:15:43 18 whether he should or should not agree

15:15:45 19 to be bound by a stipulation in the

15:15:49 20 U.S. proceedings.

15:15:50 21 And, therefore, he will not

15:15:52 22 be able to receive substantive advice

15:15:55 23 under Italian law that he is entitled

15:15:57 24 to under the Hague Convention order

15:16:00 25 which was issued by the court in Milan.

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15:16:02 2 So the question is whether
15:16:04 3 or not I would instruct him not to
15:16:05 4 answer.

15:16:07 5 I think what we would prefer
15:16:08 6 is for you to withdraw the request that
15:16:12 7 he agree to be bound by a document in
15:16:14 8 the proceeding to which he is not a
15:16:15 9 party, in a jurisdiction which he is
15:16:18 10 not amenable.

15:16:19 11 It would be better, in our
15:16:21 12 respectful view, for you to withdraw
15:16:23 13 that question because it is not
15:16:24 14 susceptible of a proper answer,
15:16:27 15 certainly in the course of today.

15:16:29 16 MR. DELL: All right. I
15:16:32 17 would appreciate an answer. So if you
15:16:34 18 want to give a direction, that's your
15:16:36 19 prerogative to do that. And,
15:16:38 20 obviously, we retain our rights, and I
15:16:40 21 can move on to another area.

15:16:41 22 If you're not going to give
15:16:42 23 a direction, then I would like to have
15:16:43 24 the witness's answer.

15:16:45 25 MS. CANNON: Well, if

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1 CONFIDENTIAL - FRANCO LAGRO - VOLUME II
15:16:46 2 pressed, we will give a direction that
15:16:48 3 he not answer your question. But the
15:16:50 4 basis of that direction is founded in
15:16:53 5 his rights under Italian law and his
15:16:57 6 -- in particular, his right to counsel
15:16:59 7 with respect to submitting to the
15:17:00 8 jurisdiction of the courts in the
15:17:02 9 United States with respect to a
15:17:04 10 stipulation in those proceedings.
15:17:06 11 We want to be very, very
15:17:08 12 clear that we are not trying to
15:17:12 13 intervene in the proper collection of
15:17:14 14 testimony by any of the parties to this
15:17:16 15 action.
15:17:17 16 And Dr. Lagro has come here
15:17:19 17 as ordered by the court in Milan to
15:17:21 18 cooperate and provide every assistance.
15:17:23 19 So we don't want this issue to be seen
15:17:25 20 as, in any way, obstructing or
15:17:28 21 challenging the obligations which
15:17:32 22 Dr. Lagro recognized that he has to the
15:17:34 23 Italian courts to be fully cooperative.
15:17:39 24 Q. Sir, in light of that
15:17:40 25 direction, I'm going to move on to a

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1 CONFIDENTIAL - FRANCO LAGRO - VOLUME II

15:17:41 2 different topic.

15:17:42 3 You were never asked to

15:17:46 4 assess the work done by Deloitte &

15:17:49 5 Touche S.p.A. in connection with any

15:17:52 6 audits of financial statements of

15:17:54 7 Parmalat Finanziaria; is that correct?

15:17:55 8 A. Correct.

15:18:14 9 Q. And the reports that you've

15:18:16 10 prepared do not do so; is that correct,

15:18:18 11 sir?

15:18:19 12 A. Correct.

15:18:24 13 Q. And you do not do so in any

15:18:28 14 of your testimony; is that correct,

15:18:30 15 sir?

15:18:30 16 A. No. That means it's

15:18:40 17 correct.

15:18:40 18 Q. Thank you, sir.

15:18:41 19 And, sir, you were never

15:18:43 20 asked to assess the work done by any

15:18:46 21 other member firm of Deloitte Touche

15:18:51 22 Tohmatsu in ordering or providing other

15:18:53 23 services to subsidiaries of Parmalat

15:18:57 24 Finanziaria, were you?

15:18:57 25 A. Not on the whole. If I

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Exhibit 5



Grant & Eisenhofer P.A.

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May 24, 2007

By E-Mail

Michael J. Dell, Esq.
 Kramer Levin Naftalis & Frankel LLP
 1177 Avenue of the Americas
 New York, NY 10036

Re: In re Parmalat Sec. Litig., No. 04 Civ. 0030 (LAK)

Dear Michael:

This is in response to your letter of May 22.

We reject your assertion that our amended Rule 26(a)(2) disclosures leave you "in the dark" as to what experts we intend to use. After you previously had complained that we did not identify from which experts retained by other parties we expected to offer testimony, we amended our disclosures to list by name each such expert from whom we intend to offer testimony. We will not withdraw our designations.

The answer to all four of the questions you pose in the bullet points on page two of your letter is no.

With respect to Chiaruttini, Lagro, Galea and Megna, Lead Plaintiffs do not agree to limit their testimony to the scope of the reports or excerpts thereof identified by Dr. Bondi in his supplemental expert witness designations. We would intend to elicit testimony, either at deposition or at trial, with respect to matters covered in the reports or excerpts thereof listed by Dr. Bondi and in the following reports by these persons:

Chiaruttini

June 7, 2004 (Exh. 2398-I)
 June 22, 2004 (Exh. 2397-I)
 Oct. 21, 2004 (Exh. 2399-I)

Michael J. Dell, Esq.
May 24, 2007
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Galea/Megna

Dec. 3, 2004, including Vol. I (Exh. 13,046-I); Vol. II Parts I and II (Exh. 13,045-I)

Lagro/PwC

Parmalat Project- Phase 1, Feb. 6, 2004 (LP0000038233-373 and BOFA1797593-765)

Parmalat Project- Phase 2, Mar. 31, 2004 (LP0000014503-635 and P02652503-635)

Parmalat project- reconstruction of in-out flows of 2003 (P03780809-834)

Information about the Ratified Assets, July 20, 2004 (P02653033-60)

Report on the results of the arranged procedures in reference to the indebtedness, June 11, 2004 (P02649904-24)

Report on the payment of commissions to banks, Mar. 29, 2005 (LP0000266499-514)

Parmalat group: documents originating in the Antilles, Jan. 14, 2004 (P03617698-731)

Selected road shows and meeting with investors, Mar. 18, 2005 (P02652769-793)

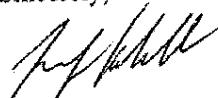
Parmalat Brazil 1999-2001 selected number of acquisitions, Aug. 12, 2005 (P03621428-538)

Parmalat Brazil financial statements, August 30, 2005 (P03622319-355)

Transactions with Citibank, May 3, 2005 (P02650664-1131)

Analysis of the settlements of receivables accepted by Archimede Securitisation Srl as of March 30, 2005, June 1, 2005 (LP0000246623-716)

Sincerely,



James J. Sabella

cc: Lisa M. Mezzetti, Esq.
Robert M. Roseman, Esq.
All other Plaintiffs' and Defendants' Counsel

Exhibit 6

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8 June 2007

VIA EMAIL & U. S. MAIL

Michael Dell, Esq.
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Re: *In re Parmalat Securities Litigation, Master Docket 04 MD 1653 (LAK)*

Dear Michael:

This letter is a follow-up to my letter of May 24, 2007 to you, in which I indicated we would send a list of specific reports we reserve the right to use in our case against Deloitte.

We reserve any right we have to use portions of the Chiaruttini and PwC reports as well as the testimony of Chiaruttini, Galea, Megna, and Lagro, including any right we may have to use their testimony as fact witnesses (including lay opinion testimony) as expert witnesses, as unretained experts, or as experts upon whom our own experts may rely. We designate those portions of the reports listed by Jim Sabella in his letter of May 24, 2007, in addition to the following:

Lagro/PwC:

Parmalat Group: Forensic Procedures – Plan and Estimates, 27 Apr 2004 (PwC LLP 000001-107)

Transactions with Bank of America, 5 May 2004 (PwC LLP 001556-660).

Wishaw Trading SA, 18 Mar 2004 (PwC LLP 000147-217).

Chiaruttini:

Expert Witness Report “Parmalat Group;” Auditing Work Performed by Deloitte & Touche, 3 Feb 2004 (not Bates labeled).

Chiaruttini 3rd, On the Auditing Activities Performed by Deloitte & Touche, 3 Feb 2004 (LP000003769-3912).

Michael Dell, Esq.
8 June 2007
Page 2

First Memorandum on the Auditing Activities Carried Out by Deloitte & Touche SPA, 18 Feb 2004 (LP0000066826-866).

Parmalat: Slides for Proceedings held March 7 - 14, 2006 (not Bates labeled).

Chiaruttini Report, 2nd, 18 Mar 2004 (LP0000066867-912).

Misc.:

Report on the causes of insolvency of Parmalat Finanziaria S.p.A. and its subsidiaries dated 19 Jun 2004 signed by the Extraordinary Commissioner Dr. Enrico Bondi (not Bates labeled).

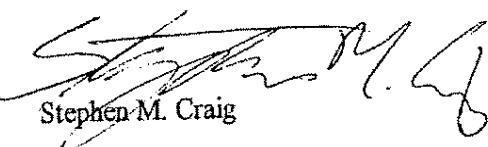
Verbale Di Ispezione ("Inspection Report"), 18 Mar 2004 (P03704220-4319)

I hope this is of assistance to you.

Best regards,

BEUS GILBERT PLLC

SMC/paw



Stephen M. Craig

cc: All counsel of record (via email)